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Office of the Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20554

Re: No. CCD 92-237; In the Matter of Administration of the North American
Numbering Plan, Carrier Identification Codes (CIC's)

Enclosed for filing in the above captioned matter are an original and four
(4) copies of a Petition of Ten (10) Iowa Local Exchange Telephone Companies
for Waiver of the January 1, 1998 Implementation Date for 4-Digit CIC. We trust
that the enclosed will be found in order for filing and grant.

Should you require any further information, or have any questions
regarding this filing, please call my office directly at (719) 594-5800.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bob Schoonmaker".

Bob Schoonmaker
Vice-President

Enclosures

cc: Service List

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Before the
Federal Communications Commission
Washington, D.C. 20554

DEC 3 1997

In the Matter of)
)
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Administration of the)
North American Numbering Plan,)
Carrier Identification Codes (CICs))

CC Docket No. 92-237

PETITION OF TEN (10) IOWA LOCAL EXCHANGE TELEPHONE COMPANIES
FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION
DATE FOR 4-DIGIT CIC

GVNW, Inc.
2270 La Montana Way
Colorado Springs, Colorado 80918

Date Submitted: December 3, 1997

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Before the
Federal Communications Commission
Washington, D.C. 20554

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North American Numbering Plan,)
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FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION
DATE FOR 4-DIGIT CIC

I. Introduction

Several Iowa local exchange telephone companies¹, by their consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "the Order"), hereby request a temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998 during which three and four digit CICs would continue to be accepted.

¹ Deep River Mutual Telephone Co., Dixon Telephone Company, Ellsworth Cooperative Telephone Assn., Frontier Communications of Schuyler, IA, Grand River Mutual Telephone Corp., Griswold Cooperative Telephone Co., LaPorte City Telephone Co., Ogden Telephone Co., River Valley Telephone Co-op, and Webb-Dickens Telephone Co.

Paragraph 20 of the Order reads, “First, we determine that LEC end office switches must be upgraded to accept four-digit CICs by January 1, 1998. Second, we determine that the transition during which use of both three-digit CICs and five-digit CACs may continue will end on June 30, 1998, rather than on January 1, 1998.”

Further, paragraph 24 states, “If we receive a complaint of LEC noncompliance, infeasibility with that deadline will not relieve a defendant LEC of liability under section 208 of the Commission’s rules. A LEC that determines that it will not meet the January 1, 1998 conversion deadline must seek relief from the Commission prior to that date.”

In compliance with the FCC’s Order on Reconsideration, specifically at paragraph 24, the Iowa companies are seeking relief of the FCC’s conversion deadline of January 1, 1998, by this request for wavier. The Iowa Companies will identify special circumstances that warrant a deviation from the Order and that a wavier will serve the public interest. They will show good cause that a waiver of the Commission’s Order is necessary and appropriate as well as in the public interest.

II. Background

Each of the Iowa Company petitioners implemented equal access by participating in centralized equal access service provided by Iowa Network Services (INS). Iowa Network Service’s centralized equal access function provides presubscription and equal access capabilities through a centralized switching system rather than through provisioning in the end office switch. Thus, the software capabilities for providing equal access are normally contained in the INS switch rather than in the petitioners end office switches. Centralized equal access allowed these small rural local exchange companies

(Iowa LECs) to provide equal access at an earlier time than in many rural areas. In most cases, as additional network requirements have arisen since implementation of centralized equal access, the petitioners have been able to provide these services through the INS switch and have not been required to invest in costly upgrades to their individual end office switches.

The petitioners generally invested in digital switching technology at a point in time earlier than otherwise would have occurred, bringing the benefits of digital technology to their rural customers. These investments were also generally made well before switch manufacturers made 4-digit CIC capabilities available. The petitioners have been able to provide satisfactory service through INS without costly upgrades or switch replacements, thus helping to reduce the cost of serving their rural customers. Through INS, the petitioners have been able to provide equal access presubscription to carriers who have been assigned 4-digit CIC codes. This has been accomplished by using the translations in their switches and the INS switch to convert the 4-digit code to a shorter code for use between the two switches. However, each of the petitioners now finds itself in the position of not being able to completely comply with the Commission's ordered January 1, 1998 4-digit CIC/7-digit CAC requirement, primarily because their switches cannot output the necessary digits to transmit a 7-digit CAC.

Because of the unique relationship between the petitioners and their centralized equal access provider, INS, these LECs relied heavily on communications with INS regarding their capabilities for meeting the 4-digit CIC requirement. Communications, both written and verbal, including communication subsequent to the Second Report and

Order in April led them to believe they could meet the 4-digit CIC requirement through INS without upgrading or replacing their switches. For example, the April 4, 1997 INS memo to its members (see Attachment I) indicated that the Nortel DMS-10 switches with a generic of 402.53 or higher would meet the requirement and that other switches had “some issues that need to be addressed.” For most of the petitioning companies, it was not until they received a November 4, 1997 FAX message from INS (see Attachment II), indicating that if they did not have SS7 capability that there would be a problem, that they realized they might not have the capability to meet the FCC’s 4-digit CIC requirement, a fact which has now been substantiated.

III. A Waiver of the Commission Rules is Necessary and in the Public Interest

The companies have taken immediate action to begin the process of achieving compliance with the Commission’s requirements upon learning from INS that they could not achieve compliance without changes to their end office switches. Individual company situations vary and will be specifically described hereafter. They range from situations where replacement switches are currently being installed, but will not be available by January 1, 1998, where replacements were planned for 1998 and plans are being formulated to move those installations forward to as early in the year as possible, to companies who are in the process of getting bids from switch vendors for either generic upgrades or switch replacements. In most cases, the companies will face considerable expenditures of funds in the next few months for the sole purpose of complying with the FCC’s order. Without that requirement, they would have been able to provide adequate service to their rural customers for as long as the next three to five years without making

these expenditures. The chart below summarizes the current cost estimates of the petitioners to meet the 4-digit CIC requirement.

| Company | # of Access Lines | # of Exchanges | Costs Upgrade/Switch Replace |
|--------------|-------------------|----------------|------------------------------|
| Deep River | 292 | 1 | Not Available |
| Dixon | 629 | 1 | \$150,000 |
| Ellsworth | 678 | 2 | Not Available |
| Frontier | 953 | 1 | \$75,000 |
| Grand River | 195 | 1 | Not Available |
| Griswold | 2,071 | 4 | \$1,000,000 |
| La Porte | 1,986 | 2 | \$370,000 |
| Ogden | 1,775 | 1 | Not Available |
| River Valley | 1,001 | 2 | Not Available |
| Webb-Dickens | 460 | 2 | \$400,000 |

Each, however, is making plans to comply with the requirement as quickly as possible, particularly in order to be able to fully meet the requirement prior to June 30, 1998. In view of the substantial expenditures that will need to be made to serve a relatively small number of subscribers, failing to grant a waiver request would not benefit the public. The companies are moving forward to implement the FCC requirements as quickly as is technically feasible. The end user customers are being, and have been provided, equal access and presubscription for several years. They have and will be able to continue to choose carriers with four-digit CIC codes for presubscription purposes. During the interim period until the full requirements can be met, only casual dialing needs cannot be fulfilled. As is shown in the accompanying individual company data, the companies serve relatively few pay telephone locations and even fewer hotels and motels where casual dialing is more likely to occur. The companies therefore request that they

be granted the additional time in order to fully comply with the FCC's timing requirements.

Specified hereafter, in a separate section for each company, are details of the companies' serving areas, exchanges where waivers are needed, access lines, current switch types and software generics. Also included, are the companies' plans for meeting the 4-digit CIC requirement and the specific waiver date being requested.

IV. Deep River Mutual Telephone Company

Deep River Mutual Telephone Company serves one exchange, Deep River, which provisions services for approximately 292 access lines, two payphones and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the generic software version 402.53. This switch and generic software were installed April 1, 1988.

In order to comply with the FCC's order, Deep River will require an upgrade to the generic software so as to accommodate the four digit-CIC and seven digit CAC. Due to the recent information received from INS that Deep River cannot accommodate these requirements with its existing switch, Deep River is expeditiously working with the manufacturer to determine the costs and timing of the software upgrade. In addition, Deep River is seeking delivery and installation dates that will meet with the FCC's required effective date for the end of the permissive period.

Deep River anticipates being able to make the required software upgrade by mid-June 1998. Deep River will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Deep River respectfully requests a wavier until June 30, 1998.

V. Dixon Telephone Company

Dixon Telephone Company ("Dixon"), serves one exchange, Dixon. The Dixon exchange provisions services for approximately 629 access lines, two payphones and no hotel/motel lines. Dixon is served by a Nortel DMS 10 with software generic 402.52. This switch was installed in 1989.

Dixon is currently in the process of negotiating switch replacements. The estimated cost is \$150, 000. Dixon is optimistic that it will be able to meet the FCC's required effective date for the end of the permissive period. It is their intent to make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Dixon respectfully requests a waiver until June 30, 1998.

VI. Ellsworth Cooperative Telephone Company

Ellsworth Cooperative Telephone Company ("Ellsworth"), serves two exchanges, Ellsworth and Garden City. The Ellsworth exchange provisions services for approximately 533 access lines, three payphones and no hotel/motel lines. The Garden City exchange provisions for 145 access lines, no payphones and no hotel/motel lines. Both exchanges are currently served by Nortel DMS 10 switches with the generic software version 305.10. These switches were installed in April of 1986.

Negotiations for new switches were finalized in June of 1997. The switches for each exchange were received in the beginning of November. Installation of each switch is to be completed during December 1997. The switches are to be scheduled to be operational in late January. Based on the aforementioned information, and to allow for possible slippage in the installation schedule, Ellsworth respectfully requests a waiver until February 28, 1998.

VII. Frontier Communications - Schuyler, Inc.

Frontier Communications - Schuyler, Inc., ("Frontier"), serves one exchange in Iowa, the Woodward exchange. The Woodward exchange provisions services for approximately 950 access lines, three payphones and no hotel/motel lines. The Woodward exchange is served by a Nortel DMS 10, with the software generic 403.31. This switch was installed in March, 1990.

Frontier is working with the switch manufacturer, Nortel, to develop an upgrade package for this switch to provide features and functions in addition to four-digit CIC capability. This upgrade package will include a software upgrade to the new generic 410.10, at an estimated cost of \$75,000. Agreement on an upgrade package with Nortel is forthcoming, whereby Frontier can initiate the installation of the software and hardware necessary for the upgrade. Frontier is optimistic that we will be able to meet the FCC's required effective date for the end of the permissive period. It is Frontier's intent to make every effort to ensure they are able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Frontier respectfully requests a waiver until June 30, 1998.

VIII. Grand River Mutual Telephone

Grand River Mutual Telephone Corporation ("Grand River") serves twelve exchanges and nearly 6,000 access lines in Iowa. One of these exchanges, Blockton, will not be capable of meeting the 4-digit CIC requirements. The Blockton exchange provisions services for approximately 195 access lines, one payphones and no hotel/motel lines. Blockton is served by a Stromberg-Carlson DCO that was installed in the early 1980s.

The current switch was originally scheduled to be replaced with a Nortel DMS 10 remote, during the last half of 1998. It is Grand River's intent to expedite the switch replacement in order to meet with the FCC's required effective date for the end of the permissive period. The Company will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Grand River Mutual respectfully requests a wavier until June 30, 1998.

IX. Griswold Cooperative Telephone Company

Griswold Cooperative Telephone Company ("Griswold"), serves four exchanges for a total of 2,071 access lines. The following provides information pertaining to the quantity of access lines by exchange:

| Exchange Name | # of Access Lines | # of Payphones | # of Hotels, Motels |
|---------------|-------------------|----------------|---------------------|
| Griswold | 1119 | 8 | 1 |
| Elliott | 428 | 1 | 0 |
| Lewis | 364 | 2 | 0 |
| Grant | 160 | 0 | 0 |
| TOTAL | 2,071 | 11 | 0 |

With regard to the current switch information, the following table provides details by exchange of the switch type, software generics and original installation date.

| Exchange Name | Switch Vendor & Type | Current Installed Generic | Switch & Generic Install Date |
|---------------|----------------------|---------------------------|-------------------------------|
| Griswold | Nortel DMS 10 | 204.11 | 12/82 |
| Elliott | Nortel DMS 10 | 301.24 | 12/84 |
| Lewis | Nortel DMS 10 | 302.50 | 12/86 |
| Grant | Nortel DMS 10 | 304.41 | 12/88 |

Griswold is currently negotiating with Nortel for switch replacements in each exchange. A bid from Nortel has been reviewed by engineering to ensure all network requirements are conducive with the overall planned network configuration. Griswold is expecting a follow up response from Nortel by December 25, 1997. The estimated cost for the combined switch replacement is \$1, 000, 000. The company has been advised by the vendor that the switches would be made available in four months.

With the current expected availability plus time for installation, Griswold anticipates being able to make the required change by the end of June 1998. Griswold

will make every effort to ensure it is able to comply with FCC's June 30, 1998, deadline.

Based on the aforementioned information, Griswold respectfully requests a waiver until June 30, 1998.

X. La Porte City Telephone Company

La Porte City Telephone Company ("La Porte"), serves two exchanges, La Porte City and Mount Auburn. The La Porte City exchange provisions services for approximately 1,817 access lines, 12 payphones and no hotel/motel lines. The Mount Auburn exchange provisions services for 169 access lines, two payphones and no hotel/motel lines. La Porte City is served by a Nortel DMS 10 with the generic software version 402.52. Mount Auburn is served by a Nortel DMS 10 with the generic software version 402.52 remote. Both switches were originally installed in July, 1986.

La Porte is undergoing negotiations with Nortel to upgrade the La Porte City exchange to a 410 generic software upgrade and a switch replacement of the Mount Auburn remote to a Nortel RCLM. The current bid provides a price of about \$370,000. La Porte will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, La Porte respectfully requests a waiver until June 30, 1998.

XI. Ogden Telephone Company

Ogden Telephone Company serves one exchange, Ogden, which provisions services for approximately 1775 access lines, six payphones and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the generic software version 402.53. This switch was originally installed on July 31, 1984, with a 301.10 software generic. In July of 1989, the software generic was upgraded to 402.53.

In order to comply with the FCC's Order, Ogden will have to upgrade the generic software so as to accommodate the four digit-CIC and seven digit-CAC. Due to the recent information received from INS that Ogden cannot accommodate these requirements with its existing switch, Ogden is expeditiously working with the manufacturer to estimate the costs and timing of the software upgrade and a possible switch replacement. In addition, Ogden is seeking delivery and installation dates that will meet the FCC's required effective date for the end of the permissive period. Nortel has advised Ogden that they will provide costs for both switch replacement and generic upgrade options on December 14, 1997.

Ogden anticipates being able to make the required change by mid June, 1998. Ogden Telephone will make every effort to ensure it is able to comply with the FCC's June 30 , 1998 deadline. Based on the aforementioned information, Ogden respectfully requests a waiver until June 30, 1998.

XII. River Valley Telephone Cooperative

River Valley Telephone Cooperative (“River Valley”), serves two exchanges, Graettinger and Wallingford. The Graettinger exchange provisions services for approximately 747 access lines, 4 payphones and no hotel/motel lines. The Wallingford exchange provisions for 254 access lines, two payphones and no hotel/motel lines. Graettinger is served by a Nortel DMS 10 with the generic software version 304.41. Wallingford is served by a Nortel DMS 10 with the generic software version 403.13 remote. Both switches were originally installed in July, 1986.

River Valley is currently in the process of negotiating switch replacements. Bids have been accepted from three manufacturers and the loan process initiated with Rural Telephone Finance Cooperative (RFTC). River Valley is optimistic that they will be able to meet the FCC’s required effective date for the end of the permissive period. It is their intent to make every effort to ensure it is able to comply with the FCC’s June 30, 1998 deadline. Based on the aforementioned information, River Valley respectfully requests a waiver until June 30, 1998.

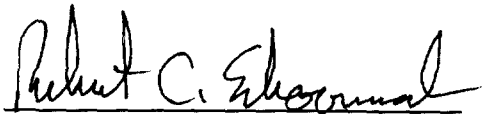
XIII. Webb-Dickens Telephone Corporation

Webb-Dickens Telephone Corporation ("Webb-Dickens"), serves two exchanges, Webb and Dickens. The Webb exchange provisions services for approximately 236 access lines, one payphone and no hotel/motel lines. The Dickens exchange provisions services for approximately 234 access lines, no payphones and no hotel/motel lines. Both switches are Nortel DMS 10s, with the software generic 402.51. These switches were installed in 1989.

Webb-Dickens has initiated the negotiation process with Nortel to upgrade the current switches to 411.10 software generic. The estimated cost for both offices is \$400,000. Webb-Dickens is optimistic that they will be able to meet the FCC's required effective date for the end of the permissive period. It is their intent to make every effort to ensure they are able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Webb-Dickens respectfully requests a waiver until June 30, 1998.

XIV. Conclusion

Each of the petitioners is actively pursuing remedies to meet the FCC's requirement as soon as possible. As demonstrated in the individual descriptions and certifications, each company has taken immediate action to remedy its situation in order to meet with the FCC's timing requirements. Grant of the instant petition will serve the public interest and will allow the companies to complete their network upgrades and/or switch replacements by the FCC's required effective date for the permissive period. The Iowa companies submit that the public interest will be better served by a waiver of the December 31, 1997 date and that grant of this petition would be consistent with the policies underlying these rules. Good cause having been shown, the Iowa Companies respectfully request the Commission grant the petition.



Robert C. Schoonmaker
Vice President, GVNW Inc./Management

12/2/97
Date

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Date: 4-4-97

To: DMS-10 Users

From: Mike Haskins

Subject: 10xxx and 101xxxx Issues

At the recent DMS-10 users meeting, I discussed some current and future situations arising with the DMS-10 product when customers dial 10xxx and 101xxxx access codes to carriers.

Firstly, if you are a SS7 compliant end office, we have written the translations to take advantage of the carrier data tables in overlay EQA. You will now be able to add carriers to your switch without doing the extremely difficult and potentially dangerous prefix translator changes, which we have for the most part either downloaded into the end offices or provided the translations necessary on a disk. These translations allow your customer to send 10xxx and 101xxxx dial patterns via the SS7 format. This does not apply for coin type of traffic that will have to remain in the MF format.

We are setting up a procedure that will both allow you to be informed of new carrier activity as well as document the activation in your end offices. We envision this to be on a fax basis that you will need to send back to us informing us that you have made the translations changes and performed any required testing or fax back to us requesting INS to perform the changes necessary. We will continue to offer this translation work free of charge.

We have the translations in place in the tandem switches and will be contacting you in the near future to coordinate the activity.

Secondly, if your DMS-10 is of an older vintage, any generic prior to 402.53, (our research shows this is when NTI expanded the outputting capability), your switches have some issues that need to be addressed:

In 1988, we developed a 10 XXX strategy that would allow the DMS-10's to output the 10 XXX access codes. The DMS-10's at that time (pre 402.53 generic) could only output 15 digits and could not output the digits necessary to complete dialing and allow for the 10 XXX equal access dialing plans. To accommodate this dialing plan, we developed a "psuedo code" plan that compressed the outputted digits, ie, 10225 1+10 was outputted as 251 1+10 that worked within the 15 digit limitation. This strategy was also limited for how many carriers it would support. Who would have thought that you would be so successful at attracting as many carriers as you have been. Now, with the carriers ordering 3 and 4 digit CIC codes at a much faster rate, the psuedo codes will soon be exhausted. Another problem is that when the carriers order a 4 digit CIC code, the dialing pattern for it is 101 XXXX which there is no way to compress the digits into 15 digits (14 with start marks).

What does this mean? It means that you need to carefully consider your upgrade plans. On the good side it is an important reason for you to upgrade. On the bad side, you need to upgrade soon or consider other options. When a carrier orders 101 XXXX access to your exchanges, the request needs to be legally honored. Does this mean tomorrow? No, but it doesn't mean we have forever to address the issue either.

When an interexchange carrier orders access to the INS network we tell them it usually takes around 90 days to get the 10 XXX/ 101 XXXX codes in place and tested in the end offices. Some of the carriers are used to working in Bell Operating area (RBOC'S) and can get 10 XXX/ 101 XXXX by ordering FGB access which for some reason is easier to provide than normal 1+ FGD access. They send out marketing materials asking the customers to dial the access codes and send faxes to you asking you to make test calls. On your network, it is easier to get the premium access first (FGD 1+) but more time consuming to get the secondary grade service. Imagine that!!

I know that this is a difficult topic to discuss with you but we felt that you deserved to know what was going on and to give you as much time as possible to consider your options.

If you have any questions or comments ,please feel free to contact me at 830-0441 to discuss.

Sincerely,

A handwritten signature in cursive script that reads "Mike".

Mike Haskins